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The Honorable Frank L. Kurtz  
Chapter 7

Attorneys for Defendant JP Morgan Chase Bank, N.A.

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:

STEVEN LESLIE SAFFER,

Debtor.

Chapter 7  
Case No. 10-03131

STEVEN LESLIE SAFFER,

Plaintiff,

v.

JP MORGAN CHASE BANK, N.A.

Defendant.

Adv. No. 10-80097-FLK

**ANSWER TO COMPLAINT BY  
DEFENDANT JP MORGAN CHASE  
BANK, N.A.**

COMES NOW JP Morgan Chase Bank, N.A. (hereinafter "Defendant") by and through its attorneys of record Routh Crabtree Olsen, P.S. and Melissa Romeo and submits the following Answer and Affirmative Defenses to Plaintiff's complaint.

1 **I. PARTIES**

2 Defendant admits the allegation of line 11.

3 Defendant denies the allegation of lines 12-13. The address for Defendant is 800  
4 Brooksedge Boulevard, Westerville, OH 43081.  
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6 **II. STATEMENT OF CAUSE**

7 Defendant admits the allegations of lines 15-16.

8 Defendant denies the remaining allegations contained in the "Statement of Cause"  
9 section.

10 **III. REMAINING SECTIONS OF PLAINTIFF'S COMPLAINT**

11 Defendant denies each and every allegation contained in the remaining sections of  
12 Plaintiff's complaint.  
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14 **IV. AFFIRMATIVE DEFENSES**

15 Defendant realleges its foregoing Answers and further alleges the following  
16 Affirmative Defenses:

- 17 1. Plaintiff has failed to mitigate his damages.  
18 2. Plaintiff has failed to state a claim upon which relief can be granted.  
19 3. Defendant expressly reserves the right to add additional affirmative defenses  
20 as it determines to be appropriate at any time in the future.  
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22 WHEREFORE, having fully answered Plaintiff's complaint, Defendant prays for  
23 relief as follows:

- 24 1. That Plaintiff takes nothing by way of its Complaint and that the same be  
25 dismissed herein;  
26 2. That Plaintiff's requested relief against Defendant be denied;

3. That Plaintiff's Complaint against Defendant be dismissed with prejudice;
4. That the Court allow Defendant to amend its answers, assert additional defenses, or assert other claims as further information is obtained;
5. That the Court award attorney fees and costs to Defendant as consistent with the terms of the note and deed of trust that form the basis of Defendant's security.
6. That the Court grant such other and further relief that the court may deem just and proper.

DATED this 23 day of September, 2010.

**ROUTH CRABTREE OLSEN, P.S.**

/s/ Melissa Romeo  
Melissa Romeo, WSBA #40644  
Attorneys for Defendant JP Morgan  
Chase Bank, N.A.

1 **Certificate of Service**

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3 I certify under penalty of perjury under the laws of the State of Washington that I

4 mailed a true and correct copy of the **Answer to Complaint by Defendant JP Morgan**

5 **Chase Bank, N.A.**, postage pre-paid, regular first class mail on the 24 day of

6 September, 2010, to the following parties:

7

8 **Attorney for Plaintiff**

9 Steven Saffer  
233 Rogue River Highway, #211  
10 Grants Pass, OR 97527

11 DATED this 23 day of September, 2010.

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13 /s/ Shawna Hall

14 Shawna Hall, Paralegal

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